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*United States Bankruptcy Counsel  
for the Class Action Plaintiffs*

In re:

SINO-FOREST CORPORATION,

Debtor in a Foreign Proceeding

Chapter 15

Case No. 13-10361 (MG)

**DECLARATION OF GARTH MYERS**

I, Garth Myers, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice under the laws of Canada and employed by the law firm of Koskie Minsky LLP (“Koskie”), one of the law firms representing the Class Action Plaintiffs.

2. On March 12, 2015, this Court entered the *Order Granting Motion to Approve Manner of Service of Notice of Motion Seeking Recognition and Enforcement of the Order of the Ontario Superior Court Approving Dealers Settlement* (the “Notice Order”) [Doc. No. 62]. Capitalized terms used but not defined herein have the meanings ascribed thereto in the Notice Order.

3. In accordance with the Notice Order, I or other counsel for the Class Action Plaintiffs caused the *Sino-Forest Securities Litigation Notice of Proposed Settlement With Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World*

*Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd., Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith Incorporated (successor by merger to Banc of America Securities LLC (the “Settlement Notice”) and Notice of Objection (together with the Settlement Notice, the “Notices”)* [Doc. No. 58 Ex. B] to be served upon (a) all individuals or entities that had contacted Koskie or other counsel to the Class Action Plaintiffs regarding the Class Actions, and to any person or entity who requested a copy of the Settlement Notice, to the extent that such person or entity had furnished his, her, or its contact information and (b) the current Service List in the CCAA Proceeding, including notice to counsel for the Dealers, on or about February 28, 2015.

5. On or about February 25, 2015, the Settlement Notice, as well as the Minutes of Settlement and pleadings relating to the approval, recognition, and enforcement of the Dealers Settlement, were posted on

- <http://kmlaw.ca/Case-Central/Overview/?rid=143> (the Koskie Minsky website),
- <http://cohenmilstein.com/cases/274/sino-forest> (the Cohen Milstein Sellers & Toll PLLC website), and
- [www.sinosettlement.com](http://www.sinosettlement.com) (the Siskinds LLP website)

6. On or about October 22, 2015, I caused a supplemental notice of the hearing in the Ontario Superior Court to consider approval of the Dealers Settlement, a copy of which is annexed hereto as **Exhibit A**, to be served on the parties who timely submitted objections to approval of the Dealers Settlement (the “**Objectors**”). Service on the Objectors was effectuated by e-mail or, if no e-mail address was provided by an Objector, by mail. A list of the Objectors is annexed hereto as **Exhibit B**.

7. On November 6, 2015, I caused a supplemental notice of the hearing in this Court to consider recognition of the Settlement Approval Order to be served on the Objectors by e-mail or, if no e-mail address was provided by an Objector, by mail. A copy of the supplemental notice is annexed hereto as **Exhibit C**.

8. On November 19, 2015, I caused copies of the *Notice of Filing of Endorsement of Ontario Superior Court* [Doc. No. 69], *Notice of Agenda* [Doc. No. 70], *Notice of Informal Response* [Doc. No. 72], and *Amended Notice of Agenda* [Doc. No. 73] to be served on the Objectors via e-mail or, if no e-mail address was provided by an Objector, by mail.

I declare that the foregoing is true and correct to the best of my knowledge or information and belief in the absence of personal knowledge as of the date hereof.

Dated: November 22, 2015

/s/ Garth Myers

Garth Myers